

NOLAN LAW GROUP

MEMO ENDORSED

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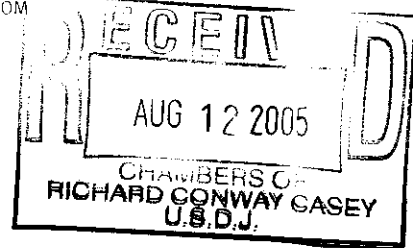
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MEMO ENDORSED

August 11, 2005

Via Federal Express Overnight Delivery



Hon. Richard Conway Casey
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street - Room 1350
New York, NY 10007-1312

RE: *In Re Terrorist Attacks of September 11, 2001 - MDL No. 1570 (RCC):*
Burnett v. Al Baraka Investment & Development, et al.
Case No. 03 CV 9849 (RCC)
Gladys Salvo, et al. v. Al Qaeda Islamic Army, et al.
Case No. 03 CV 5071 (RCC)

Dear Judge Casey:

We are writing to request Your Honor's permission to consolidate the *Salvo* case with *Burnett*; each case contains identical facts, legal issues, and named defendants. The *Salvo* complaint was filed in the Southern District of New York on July 8, 2003. *Salvo* was subsequently consolidated with the MDL action (03-MDL-1570) on December 9, 2003.

In the interest of judicial economy, we respectfully request that all prior and forthcoming docket entries (e.g., motions, orders, stipulations) filed in *Burnett* also apply retroactively and concurrently with *Salvo*. Your Honor has already endorsed a similar request from the *Ashton* plaintiffs on December 6, 2004.

Accordingly, we respectfully request Your Honor's endorsement of this proposed Order of Consolidation.

Respectfully submitted,

NOLAN LAW GROUP

Floyd A. Wisner

FAW/plj
cc: All Counsel (via email)

ADMITTED IN ILLINOIS:

DONALD J. NOLAN • ALBERT E. DURKIN • WILLIAM J. JOVAN • FLOYD A. WISNER • JAMES H. LAWLOR, III • WILLIAM A. JAEGER
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MICROFILM
-9 00AM
AUG 17 2005



SO ORDERED:

A handwritten signature in black ink, reading "Richard C. Casey".

August 16, 2005

Richard C. Casey
U.S. District Court Judge